

VIA FAX

August 7, 2020

The Honorable Colleen McMahon
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street – Room 2550
New York, New York 10007

Ok, extension granted.

Peter M. Walsh

8/10/2020

Re: *In re Allergan PLC Securities Litigation, No. 18 Civ. 12089 (CM) (GWG)*

Dear Chief Judge McMahon,

My Firm is Lead Counsel in the above-referenced action. We write with the consent of Defendants in regard to Plaintiff's August 4 letter-motion seeking a slight extension to certain deadlines in the current Case Management Plan. See ECF No. 138. Together with counsel for Defendants, we attempted to call the Court to notify Chambers that this submission is time sensitive and requires more immediate attention. We are following up with this letter, in accordance with the Court's recorded message that we reached when we attempted to call the Court.

Because of the time sensitivity of the request, we would appreciate it if the Court would consider the request today. The Parties are still expeditiously working together to complete fact discovery, due to unforeseen challenges created by the COVID-19 pandemic. However, deadlines implicated by the original case schedule begin to run today. Under the current schedule, today is the last day for the Parties to file discovery-related motions before Magistrate Judge Gorenstein (see ECF No. 99, ¶3), as well as to serve certain follow-on discovery requests. Additionally, there are other impending deadlines under the current schedule implicated by the proposed extension, including the August 12, 2020 deadline for the parties to identify experts (see ECF No. 128, at 3). The slight extensions we seek may obviate certain near-term motion practice and will allow for an orderly close to discovery.

We thank the Court for its consideration of this request.

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CC: Counsel of Record (via email)

Respectfully submitted,

/s/ Murielle J. Steven Walsh

Murielle J. Steven Walsh
POMERANTZ LLP
600 Third Avenue, Floor 20
New York, NY 10016
Phone: 212-661-1100
Email: mjsteven@pomlaw.com